

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

DATE November 27, 1984

SUBJECT Authorization to Proceed with the Enforcement Lead RI/FS at the South
Cavalcade Street Site, Harris Co., Texas -- ACTION MEMORANDUM

FROM Allyn M. Davis, Director *DA*
Air & Waste Management Division, 6AW

TO Dick Whittington, P.E.
Regional Administrator, 6A

PURPOSE

The purpose of this memorandum is to request authorization to undertake an enforcement lead Remedial Investigation and Feasibility Study at the South Cavalcade Street site. The Remedial Investigation will determine the nature and extent of sediment and groundwater contamination at the site and the Feasibility Study will develop and select the best alternative for terminating the release of hazardous substances into the environment. The State of Texas has indicated its desire to have the EPA take the lead at this site.

BACKGROUND

The South Cavalcade Street site is on the proposed National Priorities List.

The site covers about 45 acres and is located southeast of Maury-Cavalcade Street intersection in Houston, Texas, about one mile southwest of the intersection of Interstate North Loop 610 and U.S. Route 59. The site is bounded on the east and west by the Houston Belt and Terminal railroad lines.

The surface of the site slopes less than one percent. The developed portions drain into storm sewer system. The undeveloped portions of the site drain to Huntington Bayou, about three-quarters of a mile away. The subsurface consist of interbedded clays, silts, sands, and gravels of the Beaumont Formation.

The saturated sediments of the Beaumont, Lissie and other Formations form the Gulf Coast Aquifer. In the area of the site, this large, leaky artesian aquifer is encountered at less than 10 feet below the surface and extends to depths of greater than 1,000 feet.

A wood-treating facility, National Lumber and Cresoting Co., operated on the site from 1911 to 1939. The Koppers Co., Inc. acquired ownership of the facility in 1940 and operated a wood-treating and a coal tar distillation plant until 1961. Subsequently, two-thirds of the site has been developed by three palletized trucking firms.

In the early 1980's the Houston Metropolitan Transit Authority (MTA) became interested in the property for possible use as light rail maintenance yard and contracted with Camp, Dresser and McKee to conduct a geotechnical survey of the site. Creosote compounds were encountered early in the survey and as a result the MTA redefined the scope of the Camp, Dresser and McKee investigation. The resulting report, "Cavalcade Contaminant Survey," dated July 11, 1983 documents widespread surface and groundwater contamination. At one location contaminants were encountered at least 35 feet below the surface. A partial list of the contaminants includes anthracene, chrysene, fluoranthene, arsenic, chromium, and zinc. The bond issue that would have financed the Houston mass transit system was defeated, and the property is still owned by three firms.

The 1980 U.S. Census found 9,550 people living within one-half mile of the site. Groundwater is the source of all municipal drinking water in this area. There are also a number of industrial wells in the area. The continued release and migration of hazardous substances into the environment from the South Cavalcade Street site, if left undeterred, may endanger public health, welfare, and the environment in the vicinity of the site.

COMMUNITY RELATIONS

The level of citizen concern regarding this site is low. No known public interest groups are actively involved. There has been limited news media coverage. A Community Relation Plan has been initiated for the site. The objectives of the Community Relations Plan for this site are to educate the general public regarding the planned remedial activities, provide a route for comments, and promote acceptance of the best cleanup alternative.

The only activity to be recommended at this time is the issuance of a press release upon initiation of the task order by the EPA Zone Contractor. The final obligation package will include the Community Relations Plan and the press release.

ENFORCEMENT

In June 1983, the Texas Department of Water Resources (TDWR) approved MTA's formal site closure plan. The cleanup was not begun because of the failure of Houston's mass transit bond issue. TDWR then began negotiating with Koppers Co., Inc. for site cleanup. In April 1984, TDWR referred the site to EPA for Superfund Listing and remedial action. Koppers and EPA Region 6 representatives met in July 1984 and Koppers indicated their desire to work with the EPA to cleanup the site.

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PROPOSED PROJECT

The general objective of the project is to complete a Remedial Investigation and Feasibility Study for the site. The first phase of this project will consist of developing the Remedial Investigation and Feasibility Study Work Plan. The Work Plan will define the investigation that will determine the nature and extent of groundwater contamination resulting from Koppers' operations. The Work Plan will also define the Feasibility Study which will propose and select the best remedial program based on the information developed during the investigation.

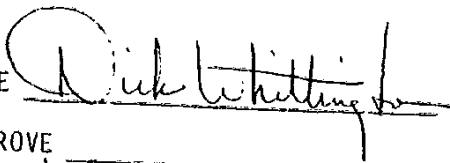
PROJECT COST AND SCHEDULE

The estimated cost of the Remedial Investigation and Feasibility Study Work Plan development is \$40,418 and the entire study is projected to cost \$490,000 should the potentially responsible parties decline involvement. The Work Plan development is estimated to take 4 months to complete and the Remedial Investigation and Feasibility Study is estimated to take 21 months to complete.

RECOMMENDATION

This request has been coordinated with the appropriate Regional and Headquarters offices and the allocation was made in the Region 6 Superfund Comprehensive Accomplishments Plan; therefore, I request that you approve proceeding with the Superfund activities at the South Calcadene Street site.

APPROVE



DISAPPROVE

DATE

Nov. 28, 1984

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